

DSJ1&2-PR Exh 562

QRA focuses on the customer as our entire SOM program is designed to ensure the integrity of the supply chain while maintaining effective controls against the potential diversion of controlled and monitored substances. Our goal is to keep and protect those Cardinal Health customers that are truly doing the "right" thing while continuing to monitor and perform due diligence to determine suspicious orders and customers that may be focusing on the illegitimate distribution of narcotics. We are customer focused in an effort to try and prevent diversion while maintaining compliance and training to our sales force so they may re-iterate that to their customers. Our goal is to perform due diligence, review early dialogue, review threshold events, review dispense data and field customer inquiries to ensure we "Know our Customer". We want to make certain there is little interruption in our customer's legitimate service. We understand there is great sensitivity in getting our customers their shipments and the severity of patient impact is great. Our SOM program is not designed to impede or detriment legitimate customer business however our responsibility as a wholesaler is to ensure to the best of our ability, with the information we are provided at that time, our customers are doing the right thing. We want to protect and preserve the legitimate customer base. Our goal is to train sales on red flags and diversion concerns so they may relay that information to the customer. If we can praise and encourage our "good" customers to continue to do the right thing, we can better keep drugs out of the wrong hands. There is a "cockroach" effect happening where if we terminate a "bad" customer based on evidence of potential diversion, those customers will scatter to "good" pharmacies. If we can train our customers on how to operate a legitimate pharmacy, the goal is that those "bad" customers will not be serviced.

